

REMARKS / DISCUSSION OF ISSUES

Claims 1-19 are pending in the application. Claims 6-19 are newly added. No new matter is added.

The applicants thank the Examiner for acknowledging the claim for priority and receipt of certified copies of all the priority document(s).

The applicants thank the Examiner for providing information about recommended section headings. However, the applicants respectfully decline to add the headings.

The Examiner is respectfully requested to state whether the drawings are acceptable.

Claims are amended for non-statutory reasons: to correct one or more informalities, remove figure label number(s), and/or to replace European-style claim phraseology with American-style claim language. The claims are not narrowed in scope and no new matter is added.

The Office action rejects claims 1 and 5 under 35 U.S.C. 112, second paragraph. The applicants respectfully traverse these rejections.

The Office action asserts that "picture value" and "inter-picture value" lack proper antecedent basis; this is incorrect. These terms are preceded by the indefinite articles "a" and "an" when they are first introduced at lines 13 and 15 of claim 1.

The Office action asks "what does picture value and inter-picture value mean?" The applicants note that claim 1 defines the picture value as the value "that provides the pixel with a respective picture appearance being one of the appearances in dependence of the picture to be displayed", and defines the inter-picture value as the value "that provides the pixel with a respective inter-picture appearance." The applicants also define a subsequent picture value as the value "that provides the pixel with a respective subsequent picture appearance being one of the appearances in dependence of the subsequent picture to be displayed." In the applicants' specification, the applicants provide examples of picture values of +15v, 0v, and -15v, although obviously the values are not limited to these examples.

The Office action asks "what does 'the sign of the subsequent picture value' mean?", and "how is it equal to the last preset value?" The applicants note that a value that is greater than 0 will have a positive sign, and a value that is less than 0 will have a negative sign. The subsequent picture value will be equal to the last preset value if both the last preset value and the subsequent picture value are positive, or both are negative, or both are zero.

In view of the above, the applicants respectfully request the Examiner's withdrawal of the rejections of claims 1 and 5 under 35 U.S.C. 112, second paragraph.

The Office action rejects claims 1-5 under 35 U.S.C. 102(e) over Webber (USPA 2002/0180687). The applicants respectfully traverse this rejection.

Webber fails to teach a driver that controls each pixel to a picture value that provides the pixel with a respective picture appearance being one of the appearances in dependence of the picture to be displayed, subsequently to an inter-picture value that provides the pixel with a respective inter-picture appearance, and subsequently to a subsequent picture value that provides the pixel with a respective subsequent picture appearance being one of the appearances in dependence of the subsequent picture to be displayed, wherein the driver is able to provide each pixel an estimate potential difference as the inter-picture value that provides the pixels with a respective estimate picture appearance as the inter-picture appearance, as specifically claimed in claim 1, upon which claims 2-5 depend.

Webber does not teach estimating potential differences that are to be applied to control the appearance of the display between the pictures that are to be displayed. Webber teaches a electrophoretic medium that provides stable black, white, and gray states, for use in a low-power display that is capable of displaying gray scale images. Webber's driver applies the appropriate picture value to the electrodes to bring the medium at each pixel to one of these states to produce each picture that is to be displayed. Webber is silent with regard to values that are to be applied to control the appearance of an inter-picture that is between the pictures to be displayed.

Because Webber fails to teach controlling each picture to an inter-picture value that provides the pixel with a respective inter-picture appearance, and because Webber fails to teach estimating a potential difference for use as the inter-picture value, as specifically claimed in claim 1, the applicants respectfully request the Examiner's reconsideration of the rejection of claims 1-5 under 35 U.S.C. 102(e) over Webber.

In view of the foregoing, the applicants respectfully request that the Examiner withdraw the objection(s) and/or rejection(s) of record, allow all the pending claims, and find the application in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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